



Writer's Direct Dial
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Government Affairs

Nathan K. Garvis

October 16, 2007

Hon. Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, S.W
Washington, DC 20554

Re: MB Docket No. 07-148
Target Corporation, Inc. Commitment To
DTV Consumer Education

Dear Chairman Martin:

Target Corporation respectfully submits this specific endorsement of the DTV Consumer Education commitments made in the Comments of the Consumer Electronics Retailers Coalition ("CERC").¹ Target, a general merchandise and food retailer and a leading national seller of consumer electronics products, is a Board member of CERC. In the CERC Comments, CERC acknowledged on behalf of its members the Commission's position of leadership in the public interest, and pledged their cooperation in helping the Commission to exercise its responsibilities so as to achieve a successful result in the DTV Transition. Target endorses CERC's pledge, and specifically advises the Commission of the DTV Public Education undertakings that Target commits to pursue.

CERC has pledged to assist the Commission in fulfilling its overall responsibilities with respect to the DTV Transition. CERC agreed with congressional leaders that the FCC has a vital leadership role to play in the Transition, and said its members will cooperate further, to assist the Commission in this role, particularly as to coordination and focus in the activities of the public and private sector members of the DTV Transition Coalition. Target specifically embraces this obligation as its own.

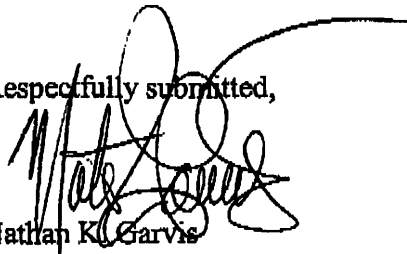
¹ *In the Matter of DTV Consumer Education Initiative*, MB Docket No. 07-148, Comments of the Consumer Electronics Retailers Coalition (Sept. 19, 2007) ("CERC Comments").

More specifically, Target has engaged the National Telecommunications Information Administration ("NTIA") Coupon-Eligible Converter Box ("CECB") Coupon Program Contractor, and its own product vendors, with a view to the earliest and most efficient possible execution of the NTIA CECB program at retail. Target, through its counsel, has also consulted extensively with Commission staff, the Chairman's office, and the offices of all Commissioners as to the undertakings that Target can and will, as discussed and guided by the FCC, pursue within its context as a general retailer of merchandise and food. Target hereby confirms having advised the Commission of the following public education and NTIA undertakings, some of which are already in process:

- Target, through published and distributed materials, will inform both its sales associates and its consumer guests of the DTV Transition and the NTIA CECB program, including needs of some guests for CECB products in aid of their existing TVs rather than for the purchase of new displays.
- Target will endeavor to include DTV Transition advisory information in future advertising supplements.
- Target will make available to its customers pamphlet material as to the DTV transition.
- Target intends to participate in the NTIA CECB program, subject to conditions and information yet to be received.
- Target will include information on its retail web commerce site on the DTV Transition and the NTIA CECB program as more specific information becomes available.
- Target will of course continue to implement compliance with Section 15.117(k) of Commission regulations until stocks of covered products are exhausted. Target is analyzing its inventory to assess the possibility of expeditiously offering its remaining stock of "analog only" TVs to those customers (such as cable subscribers) for whom they may be good values.

Through CERC and through its own personnel, Target has focused actively and specifically on cooperation with the NTIA from the program's inception, to fulfill the responsibilities delegated to it by the Congress. Target will consult with the Commission, as well, to help the FCC and the public and private members of the DTV Transition Coalition achieve coordinated message and implementation, as discussed in the CERC Comments. As noted, Target intends to participate actively in the NTIA CECB program² and believes this participation will be most effective – and most feasible for retailers – if the messaging of the FCC, the NTIA, and others is closely coordinated and aligned. Target joins CERC in acknowledging and endorsing the appropriate role of the Commission as to such coordination.

Respectfully submitted,



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cc: Commissioner Jonathan Adelstein
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Deborah Taylor Tate

² Target has advised the FCC of an intention to participate, pending receipt of additional information as to specific expectations of the NTIA CECB Program Contractor and Target's legal status as a participant, certification of CECB products (at this writing two manufacturers' products have been certified), their availability from manufacturers, coupon availability, and implementation of technical system requirements for redeeming consumers' coupons. Target has not yet seen or received any form of agreement from the IBM Team so cannot yet commit to its terms, nor does it know whether the Commission will impose additional requirements via this Docket. Target endorses CERC's observation that all parties, public and private, are working on these issues expeditiously and in good faith.